

Hearing Date and Time: June 25, 2009 at 9:45 a.m.

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*Committee of Consumer Victims of General Motors*

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK

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	:	
In re:	:	Chapter 11
	:	
GENERAL MOTORS CORP., <i>et al.</i> ,	:	Case No. 09-50026 (REG)
	:	
Debtors.	:	(Jointly Administered)
-----X	:	

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**SECOND AMENDED AND SUPPLEMENTAL EVIDENCE AND WITNESS LIST OF  
THE AD HOC COMMITTEE OF CONSUMER VICTIMS OF GENERAL MOTORS  
FOR THE DEBTORS' MOTION PURSUANT TO 11 U.S.C. §§105, 363(b), (f), (k), and  
(m), AND 365 AND FED R. BANKR. P. 2002, 6004, AND 6006, TO (I) APPROVE (A)  
THE SALE PURSUANT TO THE MASTER SALE AND PURCHASE AGREEMENT  
WITH VEHICLE ACQUISITION HOLDINGS LLC, A U.S. TREASURY-SPONSORED  
PURCHASER, FREE AND CLEAR OF LIENS, CLAIMS, ENCUMBRANCES, AND  
OTHER INTERESTS; (B) THE ASSUMPTION AND ASSIGNMENT OF CERTAIN  
EXECUTORY CONTRACTS AND UNEXPIRED LEASES; AND (C) OTHER RELIEF;  
AND (II) SCHEDULE SALE APPROVAL HEARING**

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The Ad Hoc Committee of Consumer Victims of General Motors (the “**Ad Hoc  
Consumer Committee**”), by and through its undersigned counsel, by way of a second amended  
and supplemental evidence and witness list for the Debtors’ Motion Pursuant to 11 U.S.C.  
§§105, 363(b), (f), (k), and (m), and 365 and Fed R. Bankr. P. 2002, 6004, and 6006, to (I)

Approve (A) the Sale Pursuant to the Master Sale and Purchase Agreement With Vehicle Acquisition Holdings LLC, a U.S. Treasury-Sponsored Purchaser, Free and Clear Of Liens, Claims, Encumbrances, and Other Interests; (B) the Assumption and Assignment of Certain Executory Contracts and Unexpired Leases; and (C) Other Relief; and (II) Schedule Sale Approval Hearing (the “**Sale Motion**”), hereby states:

**WITNESSES**

The Ad Hoc Consumer Committee may call as adverse witnesses Frederick Henderson, CEO of General Motors Corp. (“**GM**”) and Harry Wilson of the U.S. Auto Task Force, live or by deposition. The Ad Hoc Committee reserves its right to cross-examine witnesses called live or declaration or affidavit by the Debtors or any other party. The Ad Hoc Consumer Committee also reserves its right to amend or supplement this list upon review of discovery responses just now being provided, or otherwise should the need present itself.

**EXHIBITS**

EXHIBIT	TITLE
1	April 7, 2009 Letter from B. Bressler to H. Miller
2	April 9, 2009 Letter from H. Miller to B. Bressler
3	Cadwalader ,Wickersham & Taft, LLP Memorandum – “Use of Section 363 to Expedite Restructuring of Distressed OEMS” (GMPR000092336)
4	April 2, 2009 Cadwalader, Wickersham & Taft, LLP Memorandum (TREAS_IUE-CWA 00003013)
5	May 2, 2009 Email from J. Damour to Harry Wilson and Matthew Feldman (TREAS_IUE-CWA 00000431)

6	May 7, 2009 General Motors Contingency Planning 363 Analysis (GMPR 000195198)
7	May 9, 2009 General Motors 363 Preparation Update (GMPR 000169628)
8	May 18, 2009 GM/UAW/UST VEBA Discussion (TREAS_IUE-CWA 00002609)
9	June 3, 2009 Matthew Feldman Email (TREAS_CLA 00004749)
10	June 3, 2009 L. Buonomo Email (TREAS_CLA 00004740)
11	June 8, 2009 M. Gruskin Email (TREAS_CLA 00004735)
12	June 8, 2009 M. Feldman Email (TREAS_CLA 00004744)
13	June 25, 2009 Letter from Senator Harry Reid and Senator Richard J. Durbin to Steven Rattner

The Ad Hoc Consumer Committee may also use the Affidavit of Frederick Henderson (Docket No. 21) and any amendments or supplements thereto, the Master Transaction Agreement and any of the documents contained on the Debtors' exhibit list at the hearing on the Sale Motion.

**DEPOSITION DESIGNATIONS**

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Deposition of Harry Wilson

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SCHNADER HARRISON SEGAL  
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Dated: July 1, 2009

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